

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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DONALD CIKRA, *et al.*

Plaintiffs,

v.

LAMI PRODUCTS, LLC

Defendant.

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2:15-cv-06166-WB

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY  
APPROVAL OF THE CLASS/COLLECTIVE ACTION SETTLEMENT,  
CONDITIONAL CERTIFICATION OF THE PROPOSED SETTLEMENT  
CLASS/COLLECTIVE, AND APPOINTMENT OF INTERIM CLASS COUNSEL**

As reflected in the accompanying “Class/Collective Action Settlement Agreement,” see Doc. 33-1, the parties have agreed to settle this class/collective action lawsuit for \$1.55 million. Because class and collective action settlements must be approved by the Court for fairness, Plaintiffs Donald Cikra, Maryann Sonnett, Colleen Carlock, Gail Richmond, Caralee Brush, and Mary Hurtado (“Plaintiffs”) respectfully move, pursuant to Federal Rule of Civil Procedure 23 and 29 U.S.C. §216(b), for preliminary approval of the settlement. In addition, Plaintiffs seek conditional certification of the proposed settlement class/collective and appointment of the undersigned law firms to serve as interim class counsel. Such relief – which Defendant LaMi Products, LLC does not oppose – is warranted for the reasons described in the accompanying memorandum of law. See Doc. 34.

**WHEREFORE**, Plaintiffs respectfully request that the Court grant this motion and enter the accompanying proposed order.

Date: June 22, 2016

Respectfully,

/s/ Peter Winebrake  
Peter Winebrake  
R. Andrew Santillo

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